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*Attorney for Plaintiff*

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

KETTLE RANGE CONSERVATION  
GROUP,

Plaintiff,

v.

U.S. FOREST SERVICE, GLENN  
CASAMASSA, Pacific Northwest  
Regional Forester, U.S. Forest Service,  
RODNEY SMOLDON, Forest  
Supervisor, Colville National Forest,  
TRAVIS FLETCHER, District Ranger,  
Republic Ranger District, U.S. Forest  
Service.

Defendants.

Case No. 2:21-cv-161

**DECLARATION OF ANN E.  
PREZYNA IN SUPPORT OF  
MOTION FOR ATTORNEYS'  
FEES, COSTS, AND OTHER  
EXPENSES CORRECTED**

1 I, ANN E. PREZYNA, hereby declare:

2 1. I am a partner in Animal & Earth Advocates, counsel for Plaintiff in  
3 this matter, and have assisted lead counsel Ms. Claire Loeb Davis in developing  
4 and litigating this case, by preparing and reviewing pleadings, evaluating factual  
5 evidence, drafting declarations, and sometimes pitching in to do paralegal tasks. I  
6 have personal knowledge of all statements in this declaration.  
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8 2. I am a Washington attorney with more than 40 years of experience in  
9 state and federal environmental litigation. I graduated from Cornell University in  
10 1973 with a B.S. in Natural Resources, from the University of Wisconsin-Madison  
11 in 1977 with an M.S. in Water Resources Management and received my J.D. from  
12 The George Washington University law school in 1976 with an emphasis in  
13 environmental law.  
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15 3. I worked for nearly ten years for the Alaska Attorney General's Office  
16 on complex oil and gas matters and other environmental matters, including timber  
17 sales, commercial fishing, fish and game, and water and air pollution regulatory  
18 matters, and served as in-house environmental counsel for British Petroleum. I began  
19 working for the U.S. Environmental Protection Agency in 1987 and stayed for more  
20 than 25 years, including about 20 years as deputy regional counsel or acting regional  
21 counsel, until I retired in 2014. Following my retirement, I served as general counsel  
22 for Sea Shepherd Conservation Society, and as "of counsel" for the Animal and  
23

1 Earth Practice Group at Lane Powell, where I billed at a rate of \$665/hour in 2019.  
2 In 2019, I co-founded Animal & Earth Advocates, a law firm dedicated exclusively  
3 to bringing public interest litigation related to wildlife and the environment.

4 4. True and accurate timesheets for the time I spent on this matter are  
5 included as part of Exhibit B to the application for fees. I track my time using a  
6 stopwatch and then then enter my daily time into a timekeeping program in six-  
7 minute increments, before reviewing all my time for their accuracy. I claim a total  
8 of 94.5 attorney hours on this litigation.  
9

10 Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the  
11 foregoing is true and correct.

12 Signed and dated this 6<sup>th</sup> day of February 2024 in Palominas, Arizona.

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18 ANN E. PREZYNA  
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### **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was electronically filed with the Clerk of the Court on February 6, 2024, using the Court's electronic filing system, which will send notification of said filing to the attorneys of records that have, as required, registered with the Court's system.

/s/ Ann E. Prezyna  
Ann E. Prezyna